



“BlockFi” or the “Wind-Down Debtors”) have identified you as holding certain Claim(s)<sup>3</sup> against the Wind-Down Debtors as listed in the table at the end of this notice.

**PLEASE TAKE FURTHER NOTICE** that, prior to the Petition Date, BlockFi erroneously sent each of the holders of Claim(s) listed in the table at the end of this notice an amount of BTC valued in excess of the amount of their Claim(s), which holders have not returned to BlockFi as of the date of this notice.

**PLEASE TAKE FURTHER NOTICE** that the Wind-Down Debtors have utilized their right to set off the amounts erroneously sent to the holders of Claim(s) identified in the table at the end of this notice against such Claim(s) as provided under the Plan, and that such Claim(s) are now satisfied.

**YOU SHOULD LOCATE YOUR SCHEDULE NUMBER(S) OR CLAIM NUMBER ON THE SCHEDULE ATTACHED HERETO. PLEASE TAKE NOTICE THAT YOUR CLAIM(S) MAY BE EXPUNGED FROM THE CLAIMS REGISTER AND YOU SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO THE CLAIM FOR PURPOSES OF DISTRIBUTION AS A RESULT OF THE NOTICE OF SATISFACTION. THEREFORE, PLEASE READ THIS NOTICE VERY CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

**IF YOU HAVE QUESTIONS OR WISH TO RESPOND TO THIS NOTICE, PLEASE CONTACT WIND-DOWN DEBTORS’ COUNSEL:**

**ANDREW RIZKALLA**  
**(212) 209-4356**  
**arizkalla@brownrudnick.com**

**Important Information Regarding the Notice of Satisfaction**

**Grounds for the Notice of Satisfaction.**

In May 2021, BlockFi ran a promotion where certain customers would receive bonuses to be paid in GUSD (a stablecoin fixed at 1 GUSD = \$1), but erroneously paid those bonuses in bitcoin instead (in May 2021, approximately \$46,000). As a result, certain customers received approximately 46,000 times the bonuses they were intended to receive. While BlockFi successfully reversed many of these transactions, certain users withdrew these plainly erroneous bonuses and refused to return them, in violation of BlockFi’s terms of service and applicable law. Despite due demand, certain customers refused to return those amounts.

According to the Wind-Down Debtors’ books and records, the Wind-Down Debtors have determined that each of the holders of Claim(s) listed in the table at the end of this notice received bitcoin they did not own, withdrew it from BlockFi’s platform, and refused a demand to return it.

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<sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan.

Such customers are indebted to BlockFi for the full amount of these improper withdrawals.

Accordingly, the Wind-Down Debtors have set off and satisfied in full each of the Claim(s) listed in the table at the end of this notice as permitted under the Plan, by setting off those claims against the amount those customers owed BlockFi. BlockFi reserves all rights with respect to the balance.

Satisfaction Procedures. On March 13, 2023, the United States Bankruptcy Court for the District of New Jersey (the “Court”) entered an order [Docket No. 609] (the “Order”) approving procedures for serving Notices of Satisfaction of Claims asserted against the Wind-Down Debtors in the Chapter 11 cases (the “Satisfaction Procedures”), which are attached to the Order at Exhibit 3. ***Please review the Satisfaction Procedures carefully to ensure your response, if any, is filed and served timely and correctly. You may obtain a copy of the Order as set forth in the Additional Information section below.***

**Resolving the Notice of Satisfaction Regarding Your Claim(s)**

1. Resolving the Notice of Satisfaction. Certain of the Wind-Down Debtors’ advisors will be available to discuss and resolve consensually the Notice of Satisfaction of your Claim(s) without the need for filing a formal response or attending a hearing. Please contact Andrew Rizkalla at Brown Rudnick LLP, the Wind-Down Debtors’ counsel, via (a) e-mail at arizkalla@brownrudnick.com or (b) telephone at (212) 209-4956 within ten (10) calendar days after the date of this notice or such other date as the Wind-Down Debtors may agree in writing. Please have your Proof(s) of Claim and any related material available for any such discussions.

2. Response Contents. Each Response to a Notice of Satisfaction must contain the following (at a minimum):

- a. a caption stating the name of the Court, the name of the Debtors, the case number, the Notice of Satisfaction to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- b. a concise statement setting forth the reasons why the Court should not enter the order with respect to the Notice of Satisfaction regarding such Claim, including the specific factual and legal bases upon which the claimant will rely in opposing the Notice of Satisfaction;
- c. a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Proof of Claim (if applicable), upon which the claimant will rely in opposing the Notice of Satisfaction; *provided, however*, that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; *provided further, however*, that the claimant shall disclose to the Wind-Down Debtors all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its Claim, subject to

appropriate confidentiality constraints; and

d. the following contact information for the responding party:

- i. the name, address, telephone number, and email address of the responding claimant or the claimant's attorney or designated representative to whom the attorneys for the Wind-Down Debtors should serve a reply to the Response, if any; or
- ii. the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Notice of Satisfaction on the claimant's behalf.

3. Filing and Serving the Response. A Response will be deemed timely only if it is filed with the Court and served on all of the following parties (the "Notice Parties") so as to be actually received **by or before 4:00 p.m. (prevailing Eastern Time) on the day that is seven (7) calendar days before the Hearing (defined below) on the Notice of Satisfaction** (the "Response Deadline"), unless the Wind-Down Debtors consent to an extension in writing:

- a. Wind-Down Debtors' Counsel. (1) Brown Rudnick LLP, 7 Times Square New York, NY 10036, Attn: Andrew Rizkalla, Esq. (arizkalla@brownrudnick.com); and
- b. U.S. Trustee. Office of the United States Trustee for the District of New Jersey, One Newark Center, Suite 2100, Newark, NJ 07102, Attn: Jeffrey Sponder, Esq. (Jeffrey.M.Sponder@usdoj.gov) and Lauren Bielskie, Esq. (Lauren.Bielskie@usdoj.gov).

4. Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered at the Hearing before the Court. **Absent reaching an agreement with the Wind-Down Debtors resolving the Response to the Notice of Satisfaction, failure to file and serve a Response timely as set forth herein may result in the Wind-Down Debtors causing its Claims and Noticing Agent to expunge such Claims from the Claims Register without further notice or hearing, and such claimant shall not be treated as a creditor with respect to the Claim for purposes of distribution.**

### **Hearing on the Response**

5. Date, Time and Location. A hearing (the "Hearing") on the Notice will be held on **April 25, 2024, at 11:30 a.m.** prevailing Eastern Time, before the Honorable Michael B. Kaplan, United States Bankruptcy Judge for the District of New Jersey. The Hearing will be conducted live and virtually using Zoom for Government. To the extent parties wish to present their argument at the hearing, a request for "Presenter Status" must be submitted to the Court at least one (1) business day prior to the hearing by emailing Chambers (chambers\_of\_mbk@njb.uscourts.gov) and providing the following information: (a) name of Presenter, (b) email address of Presenter, (c) Presenter's affiliation with the case and/or (d) what party or interest the Presenter represents. If the request is approved, the Presenter will receive appropriate Zoom credentials and further

instructions via email. The hearing may be adjourned to a subsequent date in these cases in the Courts' or Wind-Down Debtors' discretion. You must attend the Hearing if you disagree with the Objection and have filed a Response that remains unresolved prior to the Hearing. If such Claims cannot be resolved and a hearing is determined to be necessary, the Wind-Down Debtors shall file with the Court and serve on the affected claimants a notice of the hearing to the extent the Wind-Down Debtors did not file a notice of hearing previously.

6. Reply to a Response. The Wind-Down Debtors shall be permitted to file a reply to any Response no later than one (1) business day before the Hearing with respect to the relevant Notice of Satisfaction.

#### **Additional Information**

7. Copies of these procedures, the Order, the Motion, or any other pleadings filed in the Debtors' Chapter 11 cases are available for free online at <https://restructuring.ra.kroll.com/blockfi>. Copies of these documents may also be obtained upon written request to the Debtors' Claims and Noticing Agent by mail at Kroll Restructuring Administration LLC, Attn: BlockFi Inquiries, 850 3rd Avenue, Suite 412, Brooklyn, New York 11232, or by email at [blockfiinfo@ra.kroll.com](mailto:blockfiinfo@ra.kroll.com). You may also obtain copies of any of the documents filed in the Debtors' Chapter 11 cases for a fee via PACER at <http://www.njb.uscourts.gov>.

#### **Reservation of Rights**

8. NOTHING IN ANY NOTICE SHALL BE DEEMED TO CONSTITUTE A WAIVER OF ANY RIGHTS OF THE WIND-DOWN DEBTORS OR ANY OTHER PARTY IN INTEREST TO DISPUTE ANY CLAIMS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO ANY CLAIMS ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION (UNLESS THE COURT HAS ALLOWED THE CLAIM OR ORDERED OTHERWISE), OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE. AFFECTED PARTIES WILL BE PROVIDED APPROPRIATE NOTICE THEREOF AT SUCH TIME.

*[Remainder of page intentionally left blank]*

Dated: April 3, 2024

/s/ Daniel M. Stolz

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<b>Claimant Name</b>	<b>Claim / Schedule No.</b>	<b>Total Claim Value</b>
Redacted	4807123, 4672222	\$53.57
Redacted	5193662, 5042987	\$15.10
Redacted	5098351, 5130196	\$2,178.57
Redacted	4317209, 4424289	\$2,636.43
Redacted	5187594, 5045033	\$22.75
Redacted	4440295, 4761147	\$1,555.70
Redacted	4368919, 4374939	\$71,314.69
Redacted	5079487, 5143681	\$684.36
Redacted	4595151, 4883387	\$5.96
Redacted	4452358, 4747976	\$1,070.17
Redacted	4484241, 4707523	\$352.86
Redacted	4334564, 4408648	\$4,819.66
Redacted	5112762, 5116222	\$28,313.44
Redacted	4662305, 4798878	\$67.01
Redacted	4403408, 4313704, 1951	\$5,878.73
Redacted	5083450, 5144364	\$645.29